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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RHONDA NAGLICH,

Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:15-cv-01256-APG-CWH

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by 30 days from November 16, 2015, to and including December 16, 2015.

Defendant respectfully requests this extension due to pre-approved leave as well as a heavy workload, including several other district court cases, despite due diligence. Defendant therefore needs additional time to properly address the issues Plaintiff raises in her Motion for Reversal and/or Remand. This request is made in good faith with no intention to unduly delay the proceedings.

1 On November 10, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no
2 objection to this motion.

3 Respectfully submitted this 10th day of November 2015.

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5 DANIEL G. BOGDEN
United States Attorney

6 /s/ Lynn M. Harada
7 LYNN M. HARADA
Special Assistant United States Attorney

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9 OF COUNSEL:

10 DEBORAH LEE STACHEL
11 Acting Regional Chief Counsel, Region IX

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13 IT IS SO ORDERED:

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15 UNITED STATES MAGISTRATE JUDGE

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17 DATED: November 12, 2015